



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

July 9, 2009

City of Seattle
700 Fifth Ave Ste 3300
Seattle, WA 98124-4023

Dear Underground Storage Tank (UST) Owner/Operator:

This letter is in reference to your UST facility(s) at the following address(es):

South Service Center
3613 4th Ave S
Seattle, WA 98134-2208

Seattle City Light
System Control Center
638 NW 46th St
Seattle, WA 98107

The United States Environmental Protection Agency (EPA) has selected your facility(s), among others, for inspection of its UST systems, per the requirements of Washington Administrative Code (WAC) 173-360, Underground Storage Tank Regulations. [Note: This will be a federal inspection, **not** a Washington State Department of Ecology (Ecology) inspection.]

The physical inspection will be done **week of July 20, 2009 and July 27, 2009**. You will be called by the Inspector, before the inspection, for the purpose of setting up an appointment. You may ask any questions pertaining to the inspection, when you are called.

The following are general summaries of the records that you will need to have on-site for the inspection. More specifics to your particular situation can be discussed with the EPA inspector who calls you. The numbers in parenthesis are references to paragraph numbers in the attached WAC regulations, so that you can review the specifics of the requirements. Here is what you need to have on hand:

1. **Documentation showing how you upgraded your UST systems** by the addition of corrosion protection, spill, and overfill equipment (WAC 173-360-305) for new tank installations and WAC 173-360-310) for existing, upgraded systems. Examples of the types of information that will document the upgraded status of your facility are pictures of the installation of the equipment, warranties (showing installation date and type of equipment), paid invoices showing the type of equipment that was installed, or being able to physically show the inspector the equipment.
2. **Documentation needed for metal upgraded tanks and/or piping:**
 - a. All metal tanks where interior lining or cathodic protection were added to existing tanks, you need to have documentation as to the means of ensuring the tanks'

integrity (e.g., visual internal inspection, mean time to corrosion test results, etc.) and results showing that they passed this integrity assessment [WAC 173-360-310(2)].

- b. For tanks that have been lined, you need to have documentation of an internal inspection, if it has been 10 years since the lining was done (unless you also have cathodic protection, in which case you do not have to do internal inspections).
 - c. For metal tanks and/or piping that have cathodic protection systems, documentation of the operation of your corrosion protection equipment (WAC 173-360-320):
 - For **all systems**, the test results of the last two corrosion system tests, required within 6 (six) months of installation and every three years thereafter.
 - Additionally, if you have an **impressed current system** (i.e., a rectifier system), the results of the last three inspections of your equipment, documented by your log of impressed current readings, which are required every 60 days.
3. **Recent compliance with the release detection requirements** (WAC 173-360-335 to -355):
- a. Documentation of the results of release detection monitoring for the tanks and piping, required every month, for the past 12 months, for your particular method.

(Note: For pressurized piping this will generally mean the “last annual test of the operation” of the automatic line leak detectors and the last annual line tightness test or documentation of a monthly monitoring method (e.g., sump sensor monitoring records).)
 - b. Records of any tightness testing for each tank and/or its piping, where required.
 - c. If you are using any equipment to conduct your release detection (e.g., an Automatic Tank Gauging (ATG) system, etc.) be sure to have a copy of the manufacturer’s “Results of US EPA Standard Evaluation” for your particular equipment (often called a “third party evaluation”). Also, you will be asked to demonstrate the use of any equipment.
 - d. Written documentation of all equipment calibration, maintenance, and repair for at least the last year. You may also be asked to provide a copy of all equipment calibration and maintenance schedules that the manufacturer requires, depending on your situation, to keep the equipment functioning properly.

4. To facilitate the inspection, **have all areas that are normally secured in some manner (e.g., sumps, fills, dispensers, etc.), unlocked and/or unbolted (especially, turbine sump covers).**
5. The records that the inspector will be looking for, should be those that had (or the testing results that you had) as of the date you received this letter (i.e., the date that you receive the letter is the date that the inspection starts, so the data for testing, etc. that you have at that time, is what will be evaluated). If you have had work done since this date, that will be evaluated, but the Inspector will also need to see the **previous set** of records (e.g., if you have had a line tightness test done since receiving this letter, then the inspector will need to see the previous set of test results). What the Inspector is looking for is your compliance status **when you receive this letter**, not after you have had further work done at the site.

Thank you for your cooperation in this matter. Again, you will be able to ask questions when you are called to set up the appointment.

Sincerely,

for Katherine M. Griffith

Robert B. Cutler
UST Coordinator for Washington State

Enclosure

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